

# EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

**[PROPOSED] ORDER**

Upon consideration of the motion (“Motion”) of Dow Jones & Company, Inc., Boston  
Globe Media Partners, LLC, and Reuters News & Media, Inc. (collectively, the “Media  
Intervenors”), and any objection thereto,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Media Intervenors are permitted to intervene in these proceedings pursuant to  
Federal Rule of Bankruptcy Procedure 2018(a).
3. The clerk shall place on the public docket an unsealed copy of the following documents:
  - a. Exhibits A–C and 1–100, 103, and 106–09 to the Declaration of Mitchell Hurley  
Dated September 29, 2020, ECF 1754;
  - b. Exhibits 1–21 to the Declaration of Jasmine Ball Dated October 14, 2020,  
ECF 1805;
  - c. Exhibits 22–24 to the Second Declaration of Jasmine Ball Dated October 14,  
2020, ECF 1807;
  - d. Exhibits 3–79 to the Declaration of Benjamin S. Kaminetzky in Support of  
Debtors’ Omnibus Objection to the Official Committee’s Motions to Compel

Production of the Debtors' Privileged Documents and Cross-Motion for a  
Protective Order, ECF 1809;

- e. Exhibits 1–123 to the Declaration of Mara Leventhal Dated October 14, 2020,  
ECF 1812.
- f. Official Committee of Unsecured Creditors' Motion to Compel Production of  
Purportedly Privileged Documents, or for In Camera Review, Based on Failure of  
the Sacklers and the Debtors to Demonstrate Documents Identified on Logs Are  
Privileged, ECF 1752;
- g. Official Committee of Unsecured Creditors' Motion to Compel Production of  
Purportedly Privileged Documents, or for In Camera Review, Based on Good  
Cause, Crime Fraud, and At Issue Exceptions to Claims of Privilege, ECF 1753;
- h. Objection of Mortimer Sackler Initial Covered Sackler Persons to the Official  
Committee of Unsecured Creditors' Motion to Compel Production of Purportedly  
Privileged Documents, or for In Camera Review, Based on Good Cause, Crime  
Fraud, and At Issue Exceptions to Claims of Privilege, ECF 1804;
- i. Objection of Mortimer Sackler Initial Covered Sackler Persons to the Official  
Committee of Unsecured Creditors' Motion to Compel Production of Purportedly  
Privileged Documents or for In Camera Review, Based on Failure of the Sacklers  
and the Debtors to Demonstrate Documents Identified on Logs Are Privileged,  
ECF 1806;
- j. Debtors' Omnibus Objection to the Official Committee's Motions to Compel  
Production of the Debtors' Privileged Documents and Cross-Motion for a  
Protective Order, ECF 1808;

- k. Letter from Department of Justice, ECF 1821;
- l. Official Committee of Unsecured Creditors' Reply in Support of Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Failure of the Sacklers to Demonstrate Documents Identified on Logs Are Privileged, ECF 2013;
- m. Official Committee of Unsecured Creditors' Reply in Support of Motion to Compel Production of Purportedly Privileged Documents, or for In Camera Review, Based on Good Cause, Crime Fraud, and At Issue Exceptions to Claims of Privilege, ECF 2014.

Dated:  
White Plains, New York

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THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE